

GIBSON DUNN

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December 11, 2015

VIA ECF AND FAX

Honorable Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: United States v. Kaleil Isaza Tuzman, No. S1 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully write this letter on behalf of defendant Kaleil Isaza Tuzman in the above captioned matter. As Your Honor is aware, Mr. Isaza Tuzman, a U.S. citizen, is currently being held in solitary confinement in a super-max detention facility in the Colombian Attorney General's headquarters—known as the “Bunker”—awaiting a lengthy extradition process to the United States on securities and accounting fraud charges. Mr. Isaza Tuzman is being detained at the Bunker in a small, windowless holding area, with little-to-no access to natural light or human interaction outside of meetings with counsel and a Rabbi.

The government's submission of Friday, December 4, 2015, represented that the government intended to respond to Mr. Isaza Tuzman's submission of Wednesday, December 2, 2015, sometime this past week and would include additional declarations. Despite the imminent close of the work week, the government has submitted no such response. We respectfully request that the Court impose a firm deadline of 5 p.m. on Monday, December 14, 2015, for the government to supplement the record, and that a Court conference be held at the Court's earliest availability thereafter.

We thank the Court in advance for its consideration of these issues.

GIBSON DUNN

Honorable Paul G. Gardephe
December 11, 2015
Page 2

Respectfully,

A handwritten signature in blue ink, appearing to read "Avi Weitzman".

Avi Weitzman
Reed Brodsky

AW

cc: Amanda L. Blaurock, Esq.
Viet Dinh, Esq.
Edward Young Kyu Kim, USAO/SDNY (*via ECF & E-Mail*)
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